

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

AMERICAN INTERNATIONAL SPECIALTY LINES)
INSURANCE COMPANY,)

Plaintiff,)

v.)

Case No. 05 C 6386

NWI-1, Inc. (F/K/A/ FRUIT OF THE LOOM, INC.),)
LEPETOMANE II, INC., as Trustee of the Fruit of)
the Loom Successor Liquidation Trust, and)
LEPETOMANE III, INC., as Trustee of the Fruit of)
the Loom Custodial Trust.)

Judge Gottschall
Magistrate Judge Mason

Defendants.)

STIPULATION AND ORDER REGARDING PENDING DISCOVERY MATTERS

The United States of America, on behalf of the United States Environmental Protection Agency, the United States Nuclear Regulatory Commission, and the National Oceanic and Atmospheric Administration, Plaintiff American International Specialty Lines Insurance Company, Inc., and Defendants/Counter-Plaintiffs NWI-1, Inc. (f/k/a Fruit of the Loom, Inc.), Lepetomane II, Inc., as Trustee of the Fruit of the Loom Successor Liquidation Trust, and Lepetomane III, Inc., as Trustee of the Fruit of the Loom Custodial Trust, (collectively, the Parties), submit the following stipulations and order for the Court's approval:

1. The Parties have reached an advanced stage of settlement negotiations to resolve all claims in this case.
2. Each party has outstanding discovery obligations, including document productions in response to requests for production, production of privilege logs, responses to notices of inadvertent production, responses to interrogatories, replies to responses to requests for production

and/or interrogatories, and other matters. These matters require a significant investment of time and resources to address.

3. The Court has ordered the Parties to submit a joint discovery plan that addresses the Ree-bie Storage documents not later than February 7, 2007. Negotiation and development of such a discovery plan will take significant time and resources.

4. The Parties believe that, at this point, their time and resources are best spent attempting to finalize a settlement agreement and believe that it will be possible to do so within a relatively short time.

5. The Parties agree that their mutual discovery obligations should be stayed for a reasonable period pending the outcome of their ongoing settlement negotiations.


6. The Parties respectfully request that the Court approve an enlargement of 30 days in which to file a discovery plan to address the Ree-bie Storage documents, with the possibility of a subsequent enlargement if approved by the Court.

In view of these stipulations,

IT IS HEREBY ORDERED THAT:

The deadline for the parties to submit the proposed discovery plan required by the Court's order of January 16, 2007 is hereby extended to March 9, 2007.

SO ORDERED this 26 day of Jan, 2007:


The Honorable Michael T. Mason
United States Magistrate Judge

IT IS STIPULATED:

FOR THE UNITED STATES OF AMERICA:

DATE: 1/24/2007

MATTHEW J. McKEOWN
Acting Assistant Attorney General
Environment and Natural Resources Division

A handwritten signature in black ink, appearing to read "Eric D. Albert", with a stylized flourish at the end.

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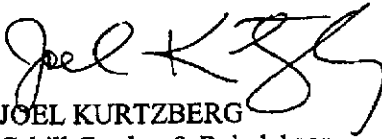
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IT IS STIPULATED:

FOR PLAINTIFF AMERICAN INTERNATIONAL SPECIALTY LINES INSURANCE
COMPANY, INC.

DATE: Jan. 25, 2007

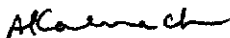


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IT IS STIPULATED:

FOR DEFENDANTS/COUNTER-PLAINTIFFS NWI-I, INC. (F/K/A/ FRUIT OF THE LOOM, INC.), LEPETOMANE II, INC., as Trustee of the Fruit of the Loom Successor Liquidation Trust, and LEPETOMANE III, INC., as Trustee of the Fruit of the Loom Custodial Trust.

DATE: January 24, 2007



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